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Attorneys for Defendants
ABDULLAH LIMITED COMPANY,
BINOTECH LLC, and HIK TECH LLC

IN THE UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA

JOANNA ARDALAN, ESQ, an
individual; ONE LLP, a California Limited
Liability Partnership,

Plaintiffs,

vs.

BINOTECH LLC; KAREN MUMMERT;
MICHAEL MUMMERT; ABDULLAH
LIMITED COMPANY; CODERS CUBE
LLC; HIK TECH LLC; DATA PATCH,
INC.; DOE 1, d.b.a. LAW INTEGRAL,
LLC, business entity unknown; DOE 2,
d.b.a. DEPUTY TRADEMARK, business
entity unknown; DOE 3, p.k.a.
MICHELLE SPRAGUE, an individual;
DOE 4, d.b.a. TRADEMARK INTEGRAL,
business entity unknown; DOE 5, d.b.a.
BRANDREGISTRATION.ORG, business
entity unknown; and DOES 6 through 10,
inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-DFM

**DECLARATION OF HAMZA
KHAN IN SUPPORT OF
MOTION TO SET ASIDE
DEFAULT OF ABDULLAH
LIMITED COMPANY,
BINOTECH LLC, and HIK TECH
LLC (FRCP 55(c))**
[Doc. 50]

U.S. District Judge:
Kenly Kiya Kato
U.S. Magistrate Judge:
Douglas F. McCormick

Courtroom: 3
3470 12th Street, Riverside,
California 92501

Complaint filed: July 12, 2023
Default taken: October 25, 2024

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS:

I, Hamza Khan, declare:

1. I am the principal owner and only manager in BINOTECH LLC, and
HIK TECH LLC. I could and would testify competently in a court of law to the

1 following if called upon to do so.

2 2. I am employed as a marketing representative for an architecture and
3 engineering company.

4 3. BINOTECH LLC was set up as a new company to out-source marketing
5 for prospective customers. HIK TECH LLC was set up as a new company to manage
6 web sites. Their respective Articles of Incorporation are at Exhibits "4" and "5." I
7 used my parents' home address for the businesses, with their consent, because I do
8 not have office space of my own.

9 4. I hired a company known as Techdrive Pvt, Ltd., to create and host web site
10 for both companies. A true copy of the invoices are attached as Exhibits "6" and "7."

11 5. Before this lawsuit was filed, I did not know the plaintiff, Joanna
12 Ardalan. I did not place any information about her on any web site, nor did I
13 authorize anyone else to put information about her on any web site. I received no
14 money from anyone associated with or who claimed to be associated with Joanna
15 Ardalan.

16 6. I do not know any person associated with any of the other businesses
17 named as defendants in this lawsuit, except of course, my brother's company
18 ABDULLAH LIMITED COMPANY. I have never heard of these other entities. I am
19 informed that some person has hacked into my web sites and posted information
20 about Joanna Ardalan. I no longer have control over my web sites, since some person
21 changed the passwords and controls the content. I have started the process with the
22 domain owner to cancel my web sites.

23 7. During the summer of 2024, I was contacted by Ms. Ardalan. Since I
24 have done nothing wrong, and I wanted to clear BINOTECH LLC and HIK TECH
25 LLC from liability, with my brother, Abdullah Khan and I agreed to speak with her
26 on video zoom. We spoke with her for about 30-40 minutes. She recorded the
27 conference. At the end of the conference she asked for documents. I provided the
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1 Articles of Incorporation for both companies, EIN documents, and the invoices. I
2 have no other documents.

3 8. I assumed Ms. Ardalan would dismiss BINOTECH LLC and HIK TECH
4 LLC from her lawsuit as settlement for having wrongly named my companies.
5 When she did not dismiss my companies, I filed an answer on behalf of BINOTECH
6 LLC and HIK TECH LLC. I was surprised when the clerk rejected my answer and
7 said that a company could only appear through an attorney. I then began to look for
8 an attorney.

9 I declare, under penalty of perjury under the laws of the United States of
10 America, that the foregoing is true and correct and executed at York, Pennsylvania on
11 November 25, 2024.

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13 Hamza Khan
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